

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001

Reference: Docket number FAA-2003-14449

“14 CFR Parts 1, 91, 121, et al., Enhanced Flight Vision Systems; Proposed Rule”

<p>Subject: Comments about the Notice of Proposed Rulemaking (NPRM) concerning operations using an Enhanced Flight Vision System (EFVS)</p>
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Costco Wholesale, Inc. would like to commend the FAA for recognizing the capability and potential of an EFVS by developing operational regulations for their use. As an operator of the Gulfstream EVS, we want to ensure that new regulations will be valid not only for today but also for the foreseeable future; therefore, we feel compelled to comment on the proposed rule.

It has been our experience that assessing flight visibility, as outlined in 14 CFR Part 91.175©(2), (d), and proposed (l), is difficult to determine and quantify in a practical manner. While the proposed rule for EFVS-equipped aircraft is consistent with existing legislation, it does not address the real problem. The existing flight visibility determination requirement is not practical. A more prudent approach would be to delete the flight visibility requirement in its entirety. This would harmonize the FAA and JAA regulations, which has been a stated goal of both agencies.

The proposed rule also defines EFVS design requirements and limitations for usage based on a specific system. Costco Wholesale feels that a performance-based rule, independent of current technology, would provide a long-lasting, fair regulation. Enabling future technology and the associated performance benefits, which may accrue to that technology, should be a goal of the new rule. Additionally, it is Costco Wholesale's opinion that the rule should focus on pertinent operational criteria. Certification criteria would be more appropriate in 14 CFR Part 25.

The proposed rule provides 14 CFR Part 91 operators a potential operational credit when using an EFVS during low visibility approach operations. As an EVS operator we have seen firsthand the benefits to situational awareness, runway incursion prevention and terrain avoidance. We believe the overall operational benefits of the Gulfstream EVS is not just for the improved minima during low visibility approach (which is a very, very minor portion of the operating profile of our aircraft) but in the overall additional safety the system brings to our aircraft. We believe very strongly that if non-Part 91 aircraft are not provided the opportunity to gain an operating benefit, the purchase of an EFVS cannot be economically justified by that class of aircraft. The benefits of an EFVS will

therefore not be available to a large portion of the US aircraft fleet. Providing an operating benefit to all classes of aircraft will stimulate not only the implementation of the technology but also will provide an increased level of safety for the aviation fleet in general.

We applaud the FAA for their quick reaction in developing official regulations for the use of EVS. Rapid adoption of revised regulations, which take the above points into consideration, would be greatly appreciated.

Yours Sincerely

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